## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA 5:23-cv-5-FL

The	Common	Apr	plica	ation.	Inc.
	COLLINIO	P	PIIC	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	,

Plaintiff.

v.

MOTION FOR EXTENSION OF TIME

Bonck America Corporation f/k/a Beijing Bonck Technology America Corporation,

Defendant.

Defendant Bonck America Corporation moves, under Rule 6, for a 30-day extension of time in which to file a responsive pleading. Defendant's answer is currently due 3 April 2023.

The Court had previously allowed an extension through 3 April 2023 so the parties could attempt to resolve this matter through a settlement. The parties have agreed, in principle, to a settlement and circulated a draft settlement agreement. However, the parties are still working towards a compromise on minor issues (e.g., mandatory jurisdiction).

Defendant prays that the Court enter an order extending Defendant's time in which to file a responsive pleading 30 days up to and including 3 May 2023 so that the parties may continue to negotiate a settlement without needing to dedicate additional resources to pleadings that may become moot.

Respectfully submitted, 3 April 2023

STAM LAW FIRM, PLLC

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## **Certificate of Service**

I certify that I served Plaintiff with a copy of this motion by electronic mail addressed to:

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3 April 2023

/s/ R. Daniel Gibson R. Daniel Gibson